

All Consolidated Case

**INTERVENORS' UNOPPOSED MOTION TO EXTEND TIME TO AMEND THE
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff-Intervenors Eddie Bernice Johnson, Sheila Jackson Lee, Alexander Green and Jasmine Crockett respectfully request that the Court extend by one week the deadline for the Intervenors to file an Amended Complaint pursuant to this Court's order of September 28, 2022. Currently, the deadline is set for October 12th, 2022. *See* ESI Order ¶ 592. The requested extension would move the deadline to October 19, 2022. Respondents do not oppose this motion if they are provided an equal one-week extension of time to respond to the filing.

The Intervenors do not seek this extension for purposes of delay. Since the Court issued its Order, the Intervenors have been steadily identifying appropriate data to include in the filing and in fact working on the amendment. However, additional time is needed to assemble and synthesize the particular information. The complexity of voting rights litigation lends itself toward voluminous data assessments, document identification and important legal analyses. All of which must be done to satisfy the Panel Order. The Intervenors seek this extension to allow it adequate time to do the foregoing. Because this Panel has previously noted that we are not on the eve of trial, Respondents will not be prejudiced by the relief.

CONCLUSION

Accordingly, Plaintiff-Intervenors Eddie Bernice Johnson, Sheila Jackson Lee, Alexander Green and Jasmine Crockett respectfully requests that the Court grant this motion and extend to October 19, 2022 its deadline amend its Complaint. A proposed order is attached.

Respectfully submitted,

By:

/s/ Gary Bledsoe

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CERTIFICATE OF CONFERENCE

I hereby certify that, on October 7, 2022, counsel for the the Johnson Intervenors communicated with attorneys for the Defendants about this request and dthere is no objection if they are provided the same additional week to respond. to the Amended Complaint. Counsel for Respondent Defendants do not oppose the relief sought.

/s/ Gary Bledsoe

Gary L. Bledsoe

CERTIFICATE OF SERVICE

I hereby certify that, on October 7, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/Nickolas A. Spencer

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